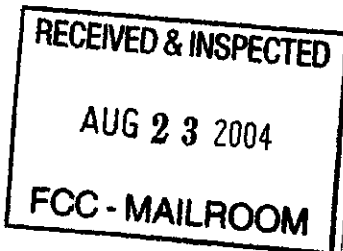


MP04-218

03-1231



(Raymond) Tongguang Yue
2525 Glen Eagles Drive
Reno, NV 89523

Tel: (775) 787-8340

E-mail Address: ry1439@sbcglobal.net

August 14, 2004

DOCKET FILE COPY ORIGINAL

RECEIVED

SEP 14 2004

Distribution Center

Michael K. Powell
Chairman of the Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Request for an FCC Inquiry into Some Questionable Practices by the Language Line Services Inc. (LLS) in Interpreter Guidelines, Training, and Supervision, Which Might Have been Jeopardizing the Quality of Its Interpreting Services and Thus Have a Tendency to Be Injurious to the Public or Against the Public Good

Dear Chairman Powell:

Recently, I forwarded you a letter concerning a request for an FCC inquiry into the fraudulent LLS interpreting strategy, which might have wasted millions of customers' paid interpreting minutes. Hopefully, that request could be honored.

Apart from the fraudulent LLS interpreting strategy, there are also some questionable practices in the LLS interpreter guidelines, training and supervision, which might have been jeopardizing the quality of its interpreting services and thus have a tendency to be injurious to the public or against the public good. In light of the severity of the problem, I was wondering if the FCC could make an inquiry into these questionable practices.

Notably, I am one of the LLS home-based interpreters. Therefore, I could only report what I have observed, recorded and thought through from my home office. In reality, the quality jeopardy possibility of the LLS interpreting services and the tendency of these questionable practices to be injurious to the public or against the public good might be more severe than I could perceive. Having said that, my report is as follows:

First and foremost, the quality jeopardy possibility of the LLS interpreting services might originate from its practicing the professionally irresponsible interpreting guidelines. Again, as Shackman writes in *The Right to Be Understood*: "A community interpreter has a very different role and responsibility from a commercial or a conference interpreter."

2

#1

RE: FW: Thank You!
8/1/02 11:42:49 AM Central Daylight Time
danyune@languageline.com
1439@aol.com

nd:

we are doing mostly community interpreting. Unfortunately, I hold very
erent view from you. And I have worked closely with Holly Mikkelson and
lieve I know where she stands.

s agree to disagree.

yune

-----Original Message-----

From: RY1439@aol.com [mailto:RY1439@aol.com]
Sent: Wednesday, July 31, 2002 9:28 PM
To: danyune@languageline.com
Subject: Re: FW: Thank You!

Dear Danyune:

Thank you for your message. After carefully reading the
commendation you
forwarded me, I happened to reach a different conclusion.
In my view, this
interpreter did facilitative interpreting instead of conduit
interpreting.
In order to make myself clear, I would like to share my
thoughts with you in
the following:

1) The term "transparent" is new to me. However, in the
context of
"transparent interpreting over facilitative interpreting," I
believe that you
actually meant "conduit interpreting over facilitative
interpreting."

2) According to the definition of an interpreter, "An
interpreter is a person
who facilitates communication by rendering the meaning of a
source language
into an equivalent meaning in the target language," (Page One
in the Binder of
LLS Agency New Hire Orientation). "facilitates" is one of
the key words.

This indicates to me that an interpreter must facilitate.
If an interpreter
doesn't facilitate, this interpreter should not be defined
as an interpreter.

3) Facilitative interpreting is much larger than conduit
interpreting,
including conduit interpreting. Thus, from the perspective
of the role of an
interpreter, this commendation is a vivid manifestation of
the success of
facilitative interpreting; from the perspective of the
skills of facilitative
interpreting, this commendation suggests to me that this
interpreter
facilitated, but did not take over. That is why this
customer felt that
"There was no extra communication between the interpreter
and the
individual." What a skillful facilitator this interpreter
is!

danyune@languageline.com wrote:

From: danyune@languageline.com
To: ry1439@sbcglobal.net
CC: weizhao@languageline.com, ying@languageline.com
Subject: RE: Warning!!!
Date: Tue, 26 Aug 2003 17:03:32 -0700

Dear Raymond:

LLS has established standards on quality and service observation based on client requirements as well as the best practice in the industry. It's unfortunate that you felt such standards are fraudulent. I believe our team, including your senior language specialist, your manager, the training manager (Kang Liao) and I have shared with you how we observe the interpreters and what our standards are, so there is nothing secret about our processes. The guidelines are published to all the interpreters. At the end of the observation, the SLS calls the interpreter to give verbal feedback, which has been a practice for years and there is nothing against you personally in what Ying was doing. Only the manager will share written feedback, and the SLS doesn't provide written performance review. This has nothing to do with secrecy and Ying Shi is acting in compliance with the Company procedure.

The Company has the stipulation that the interpreters provide complete and accurate rendition, avoiding summarization or omission, particularly on legal, insurance, and health care calls. This policy, again, is based on client's feedback as well as years of experience the Company has. The opposite practice can be problematic because any omission can be costly and detrimental to the client. You are entitled to having your personal opinion regarding the guidelines, however, once the guidelines are adopted and enforced by the Company, you are required to follow such practices to meet the requirements of the Company and be consistent with the rest of the team. Deviation from such guidelines will not be acceptable.

Best regards,

Danyune Geertsen

-----Original Message-----

Raymond [mailto:ry1439@sbcglobal.net]